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7 Attorneys for Plaintiff
United States of America

8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ROBERT ALLEN POOLEY,
15 Defendant.

CASE NO. 2:21-CR-00111 WBS

GOVERNMENT'S WITNESS LIST

DATE: May 15, 2024
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

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17 The United States, by and through its undersigned counsel, hereby submits the following list of
18 witnesses it may call in its case-in-chief:

- 19 1. Jens Peter Andersen
20 2. Julie L. Bantley
21 3. Ron Bell, Director of Safety and Training, United States Parachute Association (USPA)
22 4. Gonzalez Fabricio Palomino Benitez
23 5. Aaron Booth
24 6. James Crouch, Former Director of Safety and Training, USPA
25 7. Brian DuBois, former Special Agent, Department of Transportation Office of Inspector
26 General (DOT-OIG)
27 8. Richard Ficarelli, Special Agent, DOT-OIG
28 9. Yuri Garmashov

10. Joaquin Gomez
11. Alejandro Guerrero
12. Joshua Hall, USPA
13. Paolo Hernandez, Special Agent, DOT-OIG (ret.)
14. David Jensen, Aviation Safety Inspector, Federal Aviation Administration
15. Sang Yeul Jeong
16. Kyung "Kenny" Keum, Special Agent, former DOT-OIG, currently with U.S. Department of Agriculture, Office of Inspector General
17. Reggie Lee, Special Agent, DOT-OIG
18. Bobbi L. Lewis
19. Morgan Mackay
20. Carlos Martinez
21. Fabian Munoz
22. Corry Noel, Special Agent, Data Analytics and Computer Crimes Unit, DOT-OIG
23. Bradley North
24. Chris Opsahl
25. Danny Overeem
26. Michael Pierce
27. Mark Procos, Uninsured United Parachute Technologies (UPT)
28. Ryan Soto
29. Willard Lee Stokes, UPT
30. Susan Sullivan, USPA
31. Peter Swan
32. Paul D. Van der Walde
33. Charles "Matt" Wilkerson, Assistant Special Agent-in-Charge, Data Analytics and Computer Crimes Unit, DOT-OIG
34. Custodian of Records, Google, Inc.
35. Custodian of Records, USPA

1 36. Custodian of Records, UPT

2 37. Custodian of Records, Paypal, Inc.

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4 Dated: May 6, 2024

PHILLIP A. TALBERT
United States Attorney

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6 By: /s/ DHRUV M. SHARMA
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